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**SOAH DOCKET NO. 473-21-0538
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APPLICATION OF SOUTHWESTERN ELECTRIC POWER COMPANY FOR AUTHORITY TO CHANGE RATES	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**CITIES ADVOCATING REASONABLE DEREGULATION’S
SUPPLEMENTAL STATEMENT OF POSITION**

The Cities Advocating Reasonable Deregulation (“CARD”) file this Supplemental Statement of Position. In the Final Supplemental Direct Testimony of Ruth Stark, filed on behalf of the Staff of the Public Utility Commission of Texas, Ms. Stark reiterates her recommendation initially made in Ms. Stark’s supplemental direct testimony that CARD’s rate case expenses incurred in Docket No. 47141 should be reduced by \$6,320 because that amount exceeds the amount of CARD’s reimbursable rate case expenses the parties agreed to in Docket No. 47141.¹

CARD’s position is that the Docket No. 47141 stipulation prohibits CARD from seeking reimbursement of its reasonable rate case expenses for Docket No. 47141 incurred after April 13, 2020, but only to the extent that amount exceeds the agreed cap of \$2,500.² CARD incurred \$6,320 in rate case expenses for Docket No. 47141 after April 13, 2020.³ Thus, the adjustment to CARD’s reimbursable rate case expenses for Docket No. 47141 is \$3,820 (\$6,320 less \$2,500), and not \$6,320 as proposed by Staff.

Respectfully submitted,

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¹ Final Supplemental Direct Testimony of Ruth Stark at 7; *see also* Staff Exh. 3b, Supplemental Direct Testimony of Ruth Stark at 11-12.

² *See* Cities Advocating Reasonable Deregulation’s Reply Post-Hearing Brief at 46-47.

³ CARD Exh. 5 - Direct Testimony and Attachments of Catherine J. Webking at Attachment CJW-2, page 14 of 311.

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**ATTORNEYS FOR CITIES ADVOCATING
REASONABLE DEREGULATION**

CERTIFICATE OF SERVICE

I hereby certify that on this the 27th day of July, 2021, a true and correct copy of the foregoing document was served upon all parties of record via electronic mail, in accordance with the Order Suspending Rules, issued in Project No. 50664.

By: /s/Leslie Lindsey
Leslie Lindsey